

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Gregory Burkhart
Suzanne Lefko-Burkhart
Debtor(s)**

BK NO. 21-70415 JAD

Chapter 7

**Rocket Mortgage, LLC f/k/a Quicken
Loans, LLC**

Movant

vs.

**Gregory Burkhart
Suzanne Lefko-Burkhart**

Debtor(s)

Eric E. Bononi

Trustee

**ROCKET MORTGAGE, LLC F/K/A QUICKEN LOANS, LLC'S NOTICE
OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19
PANDEMIC**

Now comes Creditor Rocket Mortgage, LLC f/k/a Quicken Loans, LLC ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 11/01/2021 through 01/31/2022. Creditor holds a secured interest in real property commonly known as 102 Shady Dr Indiana, PA 15701. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 02/01/2022 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully Submitted,

/s/Brian C. Nicholas Esquire
Brian C. Nicholas Esquire
Attorney for Creditor